

## CASE DEVELOPMENT

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Fees</b>
05/13/02	Brown, B	Meet with Ms. Mellerson re: factual background.	1:48:00	\$306.00
05/17/02	Brown, B	Research regarding Ms. Mellerson's potential back pay.	0:30:00	\$85.00
05/24/02	Huhta, SE	Telephone call fr. J. Nash re entry of appearance and request for extension of time and proposed meeting with client.	0:24:00	\$84.00
05/29/02	Brown, B	Conference Call with J. Mellerson and J. Nash et al in Baltimore re case background	2:20:00	\$396.67
06/06/02	Brown, B	Conference call with Ms. Mellerson and J. Nash, et al at Piper Rudnick re: case background.	1:30:00	\$262.50
08/08/02	Weiss, C	Review documents and create critical documents file	4:30:00	\$967.50
<b>Total</b>			<b>11:02:00</b>	<b>\$2,101.67</b>

## PLEADINGS

Date	Timekeeper	Activity	Hours	Fees
08/12/02	Weiss, C	Meet with S. Huhta re: amended complaint	0:12:00	\$43.00
08/12/02	Huhta, SE	Conference call with B. Brown, C. Weiss and Piper Rudnick team re discovery strategy and amending complaint.	0:48:00	\$212.00
08/12/02	Weiss, C	Conference call with co-counsel to discuss strategy re: amended claims	1:40:00	\$358.33
08/13/02	Weiss, C	Draft and revise amended complaint	6:00:00	\$1,290.00
08/13/02	Weiss, C	Research ADEA, Title VII and Rehab Act, as well as jurisdictional statutes, for amended complaint	2:00:00	\$430.00
08/14/02	Weiss, C	Draft/revise amended complaint	1:54:00	\$408.50
08/16/02	Weiss, C	Research ADEA claim	0:18:00	\$64.50
08/19/02	Weiss, C	Revise draft amended complaint	1:00:00	\$215.00
08/20/02	Huhta, SE	Edit draft amended complaint.	0:24:00	\$106.00
08/21/02	Weiss, C	Research Rehab Act claim	1:24:00	\$301.00
08/21/02	Weiss, C	Research on liability issues	0:24:00	\$86.00
08/21/02	Weiss, C	Email to S. Huhta and co-counsel re: liability issues and pleadings.	0:18:00	\$64.50
08/27/02	Weiss, C	Telephone call to AUSA re: amended complaint	0:12:00	\$43.00
08/28/02	Weiss, C	Email to co-counsel re: motion for leave to amend complaint and AUSA's refusal to consent to same.	0:06:00	\$21.50
08/28/02	Weiss, C	Draft motion for leave to amend Complaint	0:18:00	\$64.50
08/29/02	Weiss, C	Revise motion for leave to amend complaint	0:24:00	\$86.00
08/29/02	Weiss, C	Research rules re: contested motion for amending complaint and revise draft motion	0:42:00	\$150.50
09/05/02	Weiss, C	Revise amended complaint based on opposing counsel's edits and edits from S. Huhta.	0:12:00	\$43.00
09/05/02	Huhta, SE	Meet with C. Weiss re draft amended complaint	0:15:00	\$66.25
09/06/02	Weiss, C	Revise amended complaint	0:30:00	\$107.50
09/09/02	Huhta, SE	Edit draft first amended complaint and motion for leave to file same	0:12:00	\$53.00
09/09/02	Weiss, C	Revise and transmit amended complaint to AUSA; call to AUSA re: same	0:30:00	\$107.50
09/13/02	Weiss, C	Telephone call to AUSA re: amended complaint and letter re: med docs	0:06:00	\$21.50
09/23/02	Weiss, C	Telephone call to AUSA re: amended complaint	0:06:00	\$21.50
09/24/02	Weiss, C	Telephone call with AUSA re: amended complaint	0:12:00	\$43.00
Total			20:07:00	\$4,407.58

## WRITTEN DISCOVERY

Date	Timekeeper	Activity	Hours	Fees
08/12/02	Weiss, C	Begin draft of discovery outline	1:12:00	\$258.00
08/12/02	Weiss, C	Email to/among S. Huhta/co-counsel re: discovery issues	0:24:00	\$86.00
08/14/02	Weiss, C	Email to co-counsel re: discovery issues and plan.	0:12:00	\$43.00
08/15/02	Weiss, C	Email to co-counsel re: discovery	0:06:00	\$21.50
08/15/02	Weiss, C	Meet with S. Huhta re discovery plan.	0:12:00	\$43.00
08/16/02	Huhta, SE	Meet with co-counsel at Piper Rudnick re discovery strategy; meet w/Mellerson re: emotional harm & damages issues, claims, and witnesses	4:00:00	\$1,060.00
08/19/02	Weiss, C	Review additional discovery documents	3:00:00	\$645.00
08/19/02	Weiss, C	Email to opposing counsel re: discovery issues	0:06:00	\$21.50
08/20/02	Weiss, C	Email to co-counsel re: various discovery issues	0:24:00	\$86.00
08/27/02	Weiss, C	Research case law re: admissibility of medical/mental health records for ordinary pain/suffering	1:18:00	\$279.50
08/27/02	Weiss, C	Research admissibility of former EEOC complaints against defendant	0:30:00	\$107.50
08/27/02	Weiss, C	Telephone call to J. Nash re: disclosures of ordinary pain/suffering damages	0:12:00	\$43.00
08/27/02	Weiss, C	Draft non-disclosure of medical/psych records section of interrogatory responses	0:18:00	\$64.50
08/27/02	Weiss, C	Email to J. Nash re: documents and witnesses for discovery responses	0:36:00	\$129.00
08/28/02	Weiss, C	Review & edit draft response to request for documents; email co-counsel re: same	0:18:00	\$64.50
09/05/02	Weiss, C	Research admissibility of prior complaints of other employees	1:54:00	\$408.50
09/09/02	Weiss, C	Research medical records disclosure issue; e-mail S. Huhta re: findings; review rules re: motions to compel	2:24:00	\$516.00
09/09/02	Weiss, C	Telephone call with J. Nash to discuss medical records disclosure	0:09:00	\$32.25
09/10/02	Weiss, C	Draft letter to AUSA re: med records	0:30:00	\$107.50
09/10/02	Weiss, C	Telephone call and e-mail to J. Nash re: discovery issues (med recs and depositions)	0:18:00	\$64.50
09/10/02	Huhta, SE	Review and edit draft ltr fr C. Weiss to AUSA re discoverability of medical records.	0:18:00	\$79.50
09/11/02	Weiss, C	Revise med recs letter to AUSA	0:42:00	\$150.50
09/13/02	Weiss, C	Email to J. Nash re: discovery ability of medical records	0:12:00	\$43.00
09/17/02	Weiss, C	Email to S. Huhta re: discovery issues and amended complaint	0:06:00	\$21.50
09/19/02	Weiss, C	Review plaintiff's document requests/interrogatories	0:12:00	\$43.00
9/19/2002	Weiss, C	Meet with S. Huhta re: SSA's destruction of promotion file and potential adverse inference to be drawn therefrom	0:18:00	\$64.50

## WRITTEN DISCOVERY

10/07/02	Weiss, C	Review documents already produced by defendant	0:54:00	\$193.50
10/07/02	Weiss, C	Review documents already produced by defendant	0:36:00	\$129.00
10/07/02	Weiss, C	Email to co-counsel re: reviewed documents	0:18:00	\$64.50
10/15/02	Weiss, C	Telephone call with N. Clarke re: Privacy Act motion, depositions and some discovery response issues	0:24:00	\$86.00
10/16/02	Weiss, C	Draft additional document requests	0:12:00	\$43.00
10/17/02	Weiss, C	Telephone calls to & from J. Nash re: document requests and interrogatories	0:48:00	\$172.00
10/17/02	Weiss, C	Review SSA discovery responses to determine deficiencies	0:12:00	\$43.00
10/25/02	Weiss, C	Meet with N. Clarke to discuss SSA's late discovery responses	0:30:00	\$107.50
10/28/02	Weiss, C	Research admissibility of prior complaints of discrimination against decision maker to show motive	0:18:00	\$64.50
10/28/02	Weiss, C	Telephone call with J. Nash re: discovery issues and potential settlement	0:21:00	\$75.25
10/29/02	Weiss, C	Research discoverability/admissibility of promotion data and former complaints	3:00:00	\$645.00
10/31/02	Weiss, C	Research re: discoverability of prior discrimination complaints and prior non-promotion data	1:06:00	\$236.50
10/31/02	Weiss, C	Review SSA discovery responses for deficiencies	0:18:00	\$64.50
10/31/02	Weiss, C	Meet with S. Huhta to discuss Mellerson discovery issues	0:12:00	\$43.00
10/31/02	Weiss, C	Telephone calls to & from J. Nash re: Mellerson discovery issues, incl. ltr to N. Clarke re: refusal to disclose SSA's prior complaints of discrimination	0:42:00	\$150.50
10/31/02	Weiss, C	Draft letter to opposing counsel re: refusal to disclose SSA's prior complaints of discrimination	0:42:00	\$150.50
10/31/02	Weiss, C	Revise letter to N. Clarke re: refusal to disclose SSA's prior complaints of discrimination	0:15:00	\$53.75
10/31/02	Weiss, C	Telephone call to N. Clarke re: SSA discovery responses	0:18:00	\$64.50
11/01/02	Weiss, C	Review SSA documents production	2:18:00	\$494.50
11/01/02	Weiss, C	Telephone call to the EEOC re: regulations to maintain records related to complaint	0:06:00	\$21.50
11/01/02	Weiss, C	Revise letter to N. Clarke re discovery of prior complaints issue	0:39:00	\$139.75
11/01/02	Weiss, C	Research admissibility/discoverability of history of discrimination	0:30:00	\$107.50
11/01/02	Weiss, C	Emails to S. Huhta re: production deficiencies, spoliation of evidence issues, and letter to N. Clarke re same	0:30:00	\$107.50

## WRITTEN DISCOVERY

11/01/02	Weiss, C	Telephone call to EEOC attorney re: regs re: maintenance and destruction of records to evaluate SSA's violation of same	0:18:00	\$64.50
11/1/2002	Weiss, C	Research adverse inference and evidence spoliation; common law, statutory and regulatory obligations to preserve evidence	3:00:00	\$645.00
11/04/02	Weiss, C	Draft discovery deficiency letter	1:18:00	\$279.50
11/04/02	Huhta, SE	Edit draft letter to AUSA re relevance of Brittingham prior complaints of discrim.	0:15:00	\$66.25
11/04/02	Weiss, C	Meet with S. Huhta to discuss deficiencies in SSA's document production	0:20:00	\$71.67
11/04/02	Weiss, C	Draft discovery deficiency letter	0:36:00	\$129.00
11/05/02	Weiss, C	Revise ltr to AUSA re: deficiencies in responses and production	2:00:00	\$430.00
11/06/02	Huhta, SE	Edit discovery dispute draft letter to AUSA	0:30:00	\$132.50
11/06/02	Weiss, C	Revise letter to N. Clarke re: discovery response and production deficiencies	0:18:00	\$64.50
11/06/02	Weiss, C	Review letter from N. Clarke re: discovery dispute	0:06:00	\$21.50
02/19/03	Weiss, C	Research evidence spoliation issue to address SSA's destruction of promotion file	0:12:00	\$43.00
<b>Total</b>			<b>43:53:00</b>	<b>\$9,687.42</b>

## DEPOSITIONS

Date	Timekeeper	Activity	Hours	Fees
07/25/02	Huhta, SE	Review Rule 4.2 re contacting current employees; emails to and fr. J. Nash re same.	0:42:00	\$185.50
09/09/02	Huhta, SE	Meet with C. Weiss re AUSA's purported refusal to allow us to interview SSA low-level employees.	0:24:00	\$106.00
09/09/02	Weiss, C	Telephone call with J. Nash re: depo notices to the SSA	0:18:00	\$64.50
09/19/02	Weiss, C	Review witness/depo list in preparation for conference call to discuss depositions	0:24:00	\$86.00
09/19/02	Weiss, C	Conference call with co-counsel re: depositions	0:24:00	\$86.00
09/20/02	Weiss, C	Email to S. Huhta re: depo schedule	0:12:00	\$43.00
09/25/02	Weiss, C	Review memo on contacting employees	0:24:00	\$86.00
10/08/02	Weiss, C	Conference call with co-counsel re: use of expert witness and depo prep	0:36:00	\$129.00
10/15/02	Weiss, C	Meet with J. Nash to discuss witness/depositions issues given SSA's position	0:12:00	\$43.00
10/15/02	Weiss, C	Prepare Mellerson for deposition	5:30:00	\$1,182.50
10/23/02	Weiss, C	Meet with S. Huhta re: defense of Mellerson depo	0:12:00	\$43.00
10/23/02	Weiss, C	Prepare for defense of Mellerson depo	1:24:00	\$301.00
10/25/02	Weiss, C	Meet with N. Clarke to discuss SSA's expressed intention to instruct H. Brittingham not to answer questions re: prior complaints of discrimination	0:30:00	\$107.50
10/25/02	Weiss, C	Telephone call with S. Huhta to discuss depo and plan discovery in light of talk with N. Clarke	0:30:00	\$107.50
10/25/02	Weiss, C	Defend Mellerson's deposition; meet with J. Nash and Ms. Mellerson for final prep for depo	4:42:00	\$1,010.50
10/31/02	Weiss, C	Draft letter to opposing counsel re N. Clarke's intended instruction to H. Brittingham not to answer questions re: refusal to disclose SSA's prior complaints of discrimination	0:42:00	\$150.50
10/31/02	Weiss, C	Revise letter to N. Clarke re her expressed intent to instruct H. Brittingham not to answer questions re: refusal to disclose SSA's prior complaints of discrimination	0:15:00	\$53.75
11/01/02	Weiss, C	Telephone call to N. Clarke re: deposition (scheduling issues)	0:06:00	\$21.50
11/01/02	Weiss, C	Revise letter to N. Clarke re: depo of H. Brittingham	0:39:00	\$139.75
11/04/02	Huhta, SE	Edit draft letter to AUSA re proposed instructions to not answer prior complaint questions at deposition; meet w/C. Weiss re same	0:15:00	\$66.25
11/05/02	Weiss, C	Prepare final draft and transmit ltr to AUSA re Brittingham's depo	0:09:00	\$32.25
11/06/02	Huhta, SE	Review letter fr AUSA re Brittingham depo discovery dispute	0:30:00	\$132.50
08/15/02	Weiss, C	Draft witness list	0:30:00	\$107.50
08/16/02	Weiss, C	Revise witness list	0:18:00	\$64.50
<b>Total</b>			<b>19:48:00</b>	<b>\$4,349.50</b>

## MOTIONS PRACTICE

<b>Date</b>	<b>Timekeeper</b>	<b>Activity</b>	<b>Hours</b>	<b>Fees</b>
06/24/02	Huhta, SE	Edit draft opposition to motion for summary judgment; motion for 56(f) discovery, and J. Nash affidavit in support of same.	1:00:00	\$270.00
07/15/02	Huhta, SE	Conference call with J. Nash etc. re Defendant's opposition and our planned reply brief on R. 56(f) motion.	0:30:00	\$132.50
07/19/02	Huhta, SE	Edit draft Rule 56(f) reply brief.	0:30:00	\$132.50
<b>Total</b>			<b>2:00:00</b>	<b>\$535.00</b>

## ADR

Date	Timekeeper	Activity	Hours	Fees
10/28/02	Weiss, C	Telephone call with J. Nash re: discovery issues and potential settlement	0:21:00	\$75.25
10/29/02	Weiss, C	Conference call with J. Nash and T. Turner re: potential settlement	0:24:00	\$86.00
10/29/02	Weiss, C	Conference call with T. Turner, and J. Nash, and S. Huhta re: potential settlement	1:12:00	\$258.00
10/31/02	Weiss, C	Conference call with J. Nash and N. Clarke re: mediation and potential stay	0:24:00	\$86.00
10/31/02	Weiss, C	Conference call with Ms. Mellerson and co-counsel to discuss settlement strategy	1:42:00	\$365.50
11/01/02	Weiss, C	Meet with S. Huhta to discuss mediation and discovery issues	0:42:00	\$150.50
11/01/02	Weiss, C	Telephone call to court re: mediation	0:12:00	\$43.00
11/01/02	Weiss, C	Telephone call to N. Clarke re: mediation and depositions	0:12:00	\$43.00
11/01/02	Weiss, C	Telephone call to court re: mediation	0:06:00	\$21.50
11/06/02	Weiss, C	Research jury verdicts on compensatory damages in D. Md. for settlement valuation purposes	1:12:00	\$258.00
11/07/02	Weiss, C	Review case law re: verdicts in prep for mediation	1:24:00	\$301.00
11/07/02	Weiss, C	Research D.Md. jury verdicts to prepare for mediation	0:30:00	\$107.50
11/20/02	Weiss, C	Draft letter to N. Clarke re: limited discovery for mediation	0:24:00	\$86.00
11/26/02	Weiss, C	Review jury verdicts to value case	0:24:00	\$86.00
11/26/02	Weiss, C	Research MD district jury verdicts	0:30:00	\$107.50
11/26/02	Weiss, C	Telephone call to J. Nash regarding mediation	0:06:00	\$21.50
11/26/02	Huhta, SE	Review correspondence fr AUSA re discovery prior to mediation and edit our draft response thereto.	0:18:00	\$79.50
11/27/02	Weiss, C	Revise (S. Huhta's comments and J. Nash's comments) and transmit letter to N. Clarke re: discovery for mediation.	0:42:00	\$150.50
12/13/02	Weiss, C	Telephone call with Mellerson re: transcript review and mediation (two calls)	0:24:00	\$86.00
12/16/02	Weiss, C	Review compensatory damages verdicts	0:12:00	\$43.00
12/16/02	Weiss, C	Email to co-counsel re: ex-parte mediation paper	0:06:00	\$21.50
12/16/02	Weiss, C	Draft ex-parte mediation paper	3:24:00	\$731.00
12/17/02	Weiss, C	Review jury verdicts to assess value of case	1:00:00	\$215.00
12/18/02	Weiss, C	Review e-mails re: ex-parte mediation paper	0:06:00	\$21.50
12/18/02	Weiss, C	Revise ex-parte mediation paper	1:30:00	\$322.50
12/20/02	Weiss, C	Revise ex-parte mediation paper and research re: same	3:18:00	\$709.50
12/23/02	Huhta, SE	Edit draft mediation paper.	0:12:00	\$53.00
01/06/03	Weiss, C	Revise mediation paper	0:30:00	\$107.50
01/12/03	Huhta, SE	Edit draft mediation paper.	1:30:00	\$397.50
01/15/03	Weiss, C	Research for mediation letter	0:24:00	\$86.00
01/20/03	Huhta, SE	Edit 2d draft from Piper of mediation position paper; email to C. Weiss re same.	0:30:00	\$132.50



## ADR

01/24/03	Weiss, C	Telephone call w/ J. Nash to discuss strategy for settlement in light of conversation w/ client	1:24:00	\$301.00
01/24/03	Weiss, C	Prepare for Mellerson mediation (e.g. gather documents, outline issues)	0:18:00	\$64.50
01/24/03	Weiss, C	Telephone call w/ client and J. Nash re: settlement	1:00:00	\$215.00
01/24/03	Weiss, C	Telephone call w/ J. Nash to plan/prepare for mediation	0:36:00	\$129.00
01/27/03	Weiss, C	Review/select cases re: compensatory damages for mediation	0:30:00	\$107.50
01/27/03	Huhta, SE	Attend mediation; meet w/client prior to prepare for same	2:30:00	\$662.50
01/28/03	Huhta, SE	Review cases supporting \$70K offer for compensatory damages; meet w/C. Weiss re same.	0:30:00	\$132.50
01/29/03	Weiss, C	Prepare cases for presentation to the court per court's request	0:12:00	\$43.00
02/03/03	Weiss, C	Review mediation follow-up letter requested by the court	0:06:00	\$21.50
02/03/03	Huhta, SE	Prepare attys fees billing records for production pursuant to mediation; edit draft letter to J. Grimm re same.	2:00:00	\$530.00
02/04/03	Huhta, SE	Prepare billing records for disclosure pursuant to mediation; tel call to J. Nash re same; meet w/C. Weiss re same.	1:30:00	\$397.50
02/05/03	Huhta, SE	Finalize preparation of billing records for letter to J. Grimm.	0:12:00	\$53.00
04/18/03	Weiss, C	Telephone call w/client re: settlement	0:12:00	\$43.00
05/20/03	Weiss, C	Telephone call to client re: settlement	0:42:00	\$150.50
05/28/03	Weiss, C	Telephone call to client re: mediation	0:12:00	\$43.00
05/28/03	Weiss, C	Attend second mediation session	5:48:00	\$1,247.00
05/30/03	Weiss, C	Research retroactive promotion value	0:48:00	\$172.00
05/30/03	Weiss, C	Conference call with S. Huhta and T. Turner re: settlement	0:48:00	\$172.00
06/02/03	Weiss, C	Telephone call to client re: mediation	1:00:00	\$220.00
06/04/03	Weiss, C	Conference call with T. Turner, S. Huhta and client re: computation of backpay and retirement	0:30:00	\$110.00
06/05/03	Weiss, C	Conference call with co-counsel, oppos counsel and judge re: settlement	0:48:00	\$176.00
06/05/03	Weiss, C	Telephone calls to T. Turner (42) and T. Turner and D. Stamper (18) re: computation of backpay and retirement benefits	1:00:00	\$220.00
06/05/03	Weiss, C	Research on regs re: calculation of backpay and retirement	0:30:00	\$110.00
06/10/03	Huhta, SE	Review ltr fr Leasure to Clarke re preservation of Brittingham documents; meet w/C. Weiss re status of settlement negotiations.	0:12:00	\$54.00
06/10/03	Weiss, C	Telephone call w/T. Turner re: calculation of retirement benefits	0:42:00	\$154.00
06/16/03	Weiss, C	Conference call with T. Turner and A. Leasure re: computation of retro retirement	0:24:00	\$88.00

## ADR

07/01/03	Weiss, C	Telephone call w/expert in disability retirement and worker's comp benefits for purposes of assessing value of retroactive promotion part of settlement	0:24:00	\$88.00
07/01/03	Weiss, C	Research worker's comp benefits to assess value of retroactive promotion for settlement	0:30:00	\$110.00
07/01/03	Weiss, C	Conference call with co-counsel re: conversation w/expert re: disability retirement benefits	0:42:00	\$154.00
07/02/03	Weiss, C	Telephone call w/expert in worker's comp benefits for purposes of assessing value of retroactive promotion for settlement	0:18:00	\$66.00
07/07/03	Weiss, C	Draft ltr to Judge Grimm re: status of settlement and retro promotion issue	0:36:00	\$132.00
07/08/03	Weiss, C	Review docs from client re: current benefits	0:12:00	\$44.00
07/08/03	Weiss, C	Revise first draft ltr to Judge Grimm, e-mail S. Huhta re: same; edit co-counsel's second draft; e-mail co-counsel re: same	0:30:00	\$110.00
07/08/03	Huhta, SE	Edit draft ltr to MJ Grimm re status of mediation; call to C. Weiss re same; review ltr fr N Clarke to Grimm re same.	0:30:00	\$135.00
07/09/03	Weiss, C	Telephone call to client re: ltr to court for mediation	0:12:00	\$44.00
08/07/03	Weiss, C	Conference call with co-counsel to discuss settlement and ltr to court re: final agreement	0:54:00	\$198.00
08/15/03	Weiss, C	Telephone call D. Stamper re: settlement in prep for conf call w/oppos counsel and court	0:36:00	\$132.00
08/15/03	Weiss, C	Conference call with court, co-counsel, client and oppos counsel re: settlement	0:18:00	\$66.00
08/15/03	Weiss, C	Conference call with client and D. Stamper re: conf call w/opposing counsel and re settlement	0:12:00	\$44.00
08/18/03	Weiss, C	Conference call w/D. Stamper and judge re: acceptance of settlement offer	0:18:00	\$66.00
08/18/03	Huhta, SE	Review and edit dr letter to MJ Grimm re potential settlement terms.	0:12:00	\$54.00
08/18/03	Weiss, C	Draft and transmit ltr to court re: Mellerson final settlement position per judge's request	0:48:00	\$176.00
08/27/03	Huhta, SE	Meet with C. Weiss re settlement strategy and gov't's delay in finalizing agreement.	0:12:00	\$54.00
08/29/03	Weiss, C	Telephone call to judge to follow-up on his call to N. Clarke and e-mail to co-counsel re: same	0:06:00	\$22.00
09/02/03	Weiss, C	Review time entries for fee petition	0:42:00	\$154.00
09/02/03	Weiss, C	Draft settlement agreement	1:00:00	\$220.00
09/02/03	Weiss, C	Email to co-counsel re: conversation w/judge and drafting of settlement agreement and fee petition	0:12:00	\$44.00
09/03/03	Weiss, C	Outline draft settlement agreement	1:48:00	\$396.00
09/04/03	Weiss, C	Revise draft settlement agreement	0:12:00	\$44.00
09/04/03	Weiss, C	Telephone call J. Grimm per his request to remind re: e-mail memorializing agreement	0:06:00	\$22.00
09/05/03	Weiss, C	Revise settlement agreement	0:06:00	\$22.00
09/09/03	Weiss, C	Review time entries for fee petition	0:12:00	\$44.00

## ADR

09/09/03	Weiss, C	Revise settlement agreement	0:12:00	\$44.00
09/09/03	Huhta, SE	Edit draft settlement agreement.	0:12:00	\$54.00
09/10/03	Weiss, C	Revise settlement agreement	0:24:00	\$88.00
09/12/03	Weiss, C	Edit N. Clarke's draft of settlement agreement, incorporate S. Huhta's edits, and give edits to co-counsel during conf call	1:12:00	\$264.00
09/12/03	Weiss, C	Emails to A.B. Leasure, D. Stamper and S. Huhta re: settlement agreement and submission of fees to J. Grimm	0:12:00	\$44.00
09/12/03	Huhta, SE	Review and edit draft settlement agreement fr defense counsel; meet w/C. Weiss re same.	0:24:00	\$108.00
10/03/03	Huhta, SE	Meet with C. Weiss re outstanding issues re draft settlement agreement.	0:12:00	\$54.00
10/03/03	Weiss, C	Telephone call to N. Clarke re: changes to settlement agreement, revise settlement agreement, e-mail to co-counsel re: same, telephone call to A. Leasure re: scheduling order and settlement	0:54:00	\$198.00
10/14/03	Weiss, C	Review changes to settlement agreement and e-mail comments	0:12:00	\$44.00
<b>Total</b>			<b>63:57:00</b>	<b>\$14,408.25</b>

## FEE PETITION

Date	Timekeeper	Activity	Hours	Fees
08/25/03	Weiss, C	Research cases re: hourly rates for fee petition	1:00:00	\$220.00
09/01/03	Weiss, C	Telephone call w/J. Grimm re: fee petition scheduling order and e-mails to co-counsel re: scheduling order	0:18:00	\$66.00
09/02/03	Weiss, C	Telephone calls to J. Grimm for confirmation of agreement w/oppos counsel and then to D. Stamper to discuss outcome and fee petition	0:24:00	\$88.00
09/03/03	Weiss, C	Sort time entries for fee petition	0:30:00	\$110.00
09/05/03	Weiss, C	Sort time entries for fee petition	1:36:00	\$352.00
09/09/03	Weiss, C	Conference call with T. Turner and D. Stamper re: fee petition and tax issue and e-mail to Sue re: same	0:24:00	\$88.00
09/09/03	Huhta, SE	Meet with C. Weiss to discuss issue of potential client taxation of attorneys fees and potential means of resolution pursuant to attys fee award.	0:12:00	\$54.00
09/10/03	Weiss, C	Telephone call to J. Grimm's chambers to set up conf call on fee petition and e-mail to co-counsel re: same	0:06:00	\$22.00
09/11/03	Huhta, SE	Telephone call to T. Turner re issue of how to address potential tax liability of Ms. Mellerson for attorneys fee award; conf call w/Turner, Stamper, other co-counsel and Mellerson re same.	1:00:00	\$270.00
09/29/03	Weiss, C	Conference call with J. Grimm, oppos counsel and co-counsel re: fee petition	0:12:00	\$44.00
10/02/03	Weiss, C	Draft and revise fee petition scheduling order	0:30:00	\$110.00
10/20/03	Weiss, C	Research for fee petition	0:54:00	\$198.00
10/20/03	Weiss, C	Draft memorandum for fee petition	2:30:00	\$550.00
10/21/03	Weiss, C	Research for fee petition	1:12:00	\$264.00
10/21/03	Weiss, C	Draft and revise fee petition memorandum	5:36:00	\$1,232.00
10/22/03	Weiss, C	Revise fee petition memo	2:00:00	\$440.00
10/22/03	Weiss, C	Research for fee petition memo	0:18:00	\$66.00
10/23/03	Weiss, C	Review billing entries for fee petition	0:42:00	\$154.00
10/23/03	Huhta, SE	Review and edit billing entries for ultimate submission of request for attys fees.	1:18:00	\$351.00
10/23/03	Weiss, C	Draft fee petition memo, proposed order, declaration of S. Huhta; revise/edit same	1:36:00	\$352.00
10/23/03	Weiss, C	Research for fee petition memo	1:54:00	\$418.00
10/24/03	Weiss, C	Research for fee petition	1:36:00	\$352.00
10/24/03	Weiss, C	Telephone call with S. Huhta re fee petition draft memo	0:12:00	\$44.00
10/24/03	Weiss, C	Revise fee petition memo	1:24:00	\$308.00
10/26/03	Huhta, SE	Edit draft memo in support of fee petition.	1:30:00	\$405.00
10/27/03	Weiss, C	Prepare for fee petition exhibits by categorizing time entries per Appendix B and e-mail S. Huhta w/questions re: certain entries	0:54:00	\$198.00
10/27/03	Weiss, C	Revise fee petition memo based on S. Huhta's edits; review edits	1:36:00	\$352.00
10/27/03	Weiss, C	Research for fee petition memo	0:18:00	\$66.00
10/28/03	Weiss, C	Prepare categorization of entries and meet with M. Kirenga re: creation of spreadsheets for same	0:42:00	\$154.00
10/28/03	Weiss, C	Revise fee petition memo and send e-mail to S. Huhta w/questions re: same	0:48:00	\$176.00
10/30/03	Huhta, SE	Review and revise sorting of billing entries pursuant to Appendix B requirements.	0:48:00	\$216.00

## FEE PETITION

10/30/03	Huhta, SE	Edit revised draft brief in support of fee petition; email to C. Weiss re same.	0:42:00	\$189.00
10/30/03	Huhta, SE	Review caselaw (Johnson & Thompson) regarding standards governing fee awards in D. Md. and Fourth Circuit.	0:42:00	\$189.00
10/31/03	Weiss, C	Research for fee petition memo	0:42:00	\$154.00
10/31/03	Weiss, C	Revise declaration for fee petition	0:42:00	\$154.00
10/31/03	Weiss, C	Revise fee petition memo	0:30:00	\$110.00
10/31/03	Weiss, C	Edit categorized fee entries	0:30:00	\$110.00
11/03/03	Weiss, C	Revise declaration for fee petition	0:12:00	\$44.00
11/04/03	Weiss, C	Revise declaration for fee petition	0:30:00	\$110.00
11/10/03	Weiss, C	Review correspondence btw P's counsel and D's counsel to identify exhibits for fee petition	0:42:00	\$154.00
11/12/03	Huhta, SE	Conference call with co-counsel re brief in support of fees and related issues; tel call fr. T. Turner re same.	1:00:00	\$270.00
11/13/03	Huhta, SE	Review and edit revised draft of fee petition memorandum; emails to and fr co-counsel re same; review Piper Rudnick itemization of costs.	0:48:00	\$216.00
11/13/03	Weiss, C	Revise fee petition memorandum	0:12:00	\$44.00
11/14/03	Weiss, C	Telephone calls w/D. Stamper re: exhibits for fee petition	1:24:00	\$308.00
<b>Total</b>			<b>38:48:00</b>	<b>\$8,936.00</b>